

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STENIO and RAQUEL DESOUZA, :
:
Plaintiffs, :
v. : : CIVIL ACTION NO. 05-787
J.N. CARPENTRY, INC., et al., :
:
Defendants. : JURY TRIAL DEMANDED

PROPOSED SCHEDULING ORDER

At Wilmington, this 24 day of October, 2006, having satisfied their obligations under Fed. R. Civ. P.26(f), and the court having conducted a pretrial scheduling conference pursuant to Fed. R. Civ. P. 16 and D.Del. LR 16.2(a) and (b)

IT IS ORDERED THAT:

1. **Pre-Discovery Disclosures:** The parties will exchange by November 15, 2006, the information required by Fed.R.Civ.P.23(a)(1) and D.Del.LR 16.2.
2. **Discovery.**
 - (a) Discovery will be needed on the following subjects: (brief description of subjects on which discovery will be needed).
 - (b) All discovery shall be commenced in time to be completed by June 1, 2007.
 - (c) Maximum of 30 interrogatories by each party to any other party.
 - (d) Maximum of 30 requests for admission by each party to any other party.
 - (e) Maximum of 20 depositions by plaintiff and 10 by defendant.
 - (f) Each deposition is limited to a maximum of 7 hours unless extended by agreement of the parties.

(g) Reports from retained experts under Rule 26(a)(2) on issues for which any party has the burden of proof due by March 15, 2007. Rebuttal expert reports due by April 15, 2007.

(h) **Discovery Disputes**. Any discovery dispute shall be submitted to the court pursuant to Fed.R.Civ.P. 37. during the course of discovery, each party is limited to two (2) Rule 37 motions. The court shall make itself available, however, to resolve through a telephone conference, disputes that arise during the course of a deposition and disputes related to entry of a protective order.

3. **Joinder of other Parties, Amendment of Pleadings, and Class Certification**. All motions to join other parties, amend the pleadings, and certify a class action shall be filed on or before October 30, 2006.

4. **Settlement Conference**: Pursuant to 28 U.S.C. §636, this matter is referred to Magistrate Judge Thyng for the purposes of exploring ADR.

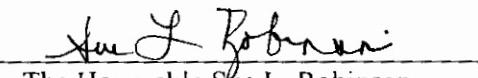
5. **Summary Judgment Motions**: all summary judgment motions shall be served and filed with an opening brief on or before July 2, 2007, with briefing to be completed on or before August 1, 2007. Briefing shall be pursuant to D.Del.LR 7.1.2. No summary judgment motion may be filed more than **ten (10)** days from the above date without leave of the court.

6. **Applications by Motion**: Any application to the court shall be by written motion filed with the clerk. Unless otherwise requested by the court, counsel shall not deliver copies of paper or correspondence to chambers. **Any non-dispositive motion shall contain the statement required by D.Del. LR 7.1.1.**

7. **Motions in Limine**: Any party filing a motion in limine shall file it on or before September 25, 2007, and responses to such motions shall be filed on or before October 2, 2007.

8. **Pretrial Conference:** A pretrial conference will be held on October 9, 2007 at 4:30 p.m. in courtroom 6B, sixth floor Federal Building, 844 King Street, Wilmington, Delaware. The Federal Rules of Civil Procedure and D.Del. LR 16.4 shall govern the pretrial conference.

9. **Trial:** This matter is scheduled for a one week jury trial commencing on October 22, 2007 in courtroom 6B, sixth floor Federal Building, 844 King Street, Wilmington, Delaware. For the purposes of completing pretrial preparations, the parties should plan on being allocated a number of hours in which to present their respective cases.



The Honorable Sue L. Robinson